

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

- - -
EQUAL EMPLOYMENT :
OPPORTUNITY COMMISSION, :
Plaintiff, :
and :
KATHY C. KOCH, :
Plaintiff-Intervenor, :
V. :
LA WEIGHT LOSS, : NO.
Defendant. : WDQ-02-CV-648
- - -

November 30, 2004
- - -

Oral deposition of LESIA
PETRIZIO held in the offices of EEOC's
Philadelphia District Office, The Bourse
Building, 21 S. Fifth Street, Suite 400,
Philadelphia, Pennsylvania 19106
commencing at 10:35 a.m. on the above
date, before Linda Rossi Rios, a
Federally Approved Registered
Professional Reporter and Notary Public
of the Commonwealth of Pennsylvania.
- - -

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1 history, I would call them back. If they
2 had non-relevant working experience, I
3 would usually send the resume back to HR
4 and say, you know, this applicant doesn't
5 have relevant working experience.

6 Q. How do you define relevant
7 working experience?

8 A. Well, relevant working
9 experience in this industry would be
10 retail. Relevant working experience
11 would be cosmetics, it would be dating
12 industry, it would be hotel industry.
13 I'm sure I'm missing -- health club
14 industry. Anything in the hospitality
15 industry, that's for sure. Retail, I
16 said that. Cosmetics.

17 Q. Restaurants?

18 A. Restaurants, part of
19 hospitality. Other weight loss
20 industries would be an absolute.
21 Probably missing a few, but those would
22 be the general relevant working
23 experience.

24 Q. And that's relevant at this

1 A. Ever since I've worked for
2 the company, it's always been the
3 procedure that everything goes to HR.

4 Q. Now, you would agree with me
5 that in 1997, there was no HR department
6 at LA Weight Loss?

7 A. Well, we had a payroll HR
8 department. I mean, what we know as HR
9 today was our payroll department then.
10 They're one and the same. So the person
11 that handled all the personnel files and
12 handled all the employee applications and
13 handled all your payroll. I mean, that
14 technically was our HR department.

15 Q. Who did you deliver --

16 A. Sandy was her name.

17 Q. Sandy Miller?

18 A. I believe that's her last
19 name.

20 Q. So that's the person that
21 you delivered these resumes to?

22 A. Yes, and my paycheck and my
23 expense check.

24 Q. So you've looked at the

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1 time you were doing hiring for center
2 level jobs?

3 A. Correct.

4 Q. All right. So you've done
5 this review and some of the resumes have
6 relevant work history and some of them
7 don't. With respect to the ones that
8 don't, what do you do with the resume?

9 A. Send it back to HR.

10 Q. Send it back how?

11 A. Usually by mail. But since
12 I was so close to Philly, I usually
13 dropped my packages off. We had Monday
14 mailbags. And we would stick everything
15 in our Monday mailbag to HR, and
16 everything would go back. But I live
17 very close so usually every Monday my
18 routine was to drop my payroll off, drop
19 my expense reports off and drop off my
20 packet of HR. That was my routine every
21 Monday. I was there, I lived there.

22 Q. Was there ever a time during
23 the period of start of '97 to October of
24 '98 where that was not the procedure?

1 resume and now you have some resumes that
2 do have relevant experience. Do you
3 interview -- I mean, what's the next
4 step?

5 A. Well, the next step is you
6 call up the lead, and you usually -- most
7 of the time you never got somebody live.
8 You call them up, leave a message, wait
9 for them to call you back.

10 Q. Then what?

11 A. When they call you back,
12 then you start the whole process over. I
13 got -- you know, I have your resume in
14 front of me, you're interested in what
15 area, what are you looking for.

16 Q. A prescreening?

17 A. Yeah. Basically.

18 Q. And what you're looking for
19 in the prescreening is interest and
20 elaboration on their qualifications. Is
21 that correct?

22 A. You're looking for, number
23 one, can they sell, do they have sales
24 background, sales experience,

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1 commission-based sales. We work on
2 commission, all of our checks are
3 relevant. Do they want to work the
4 hours. Especially on a center manager
5 level you have to be available -- at that
6 time we were open 9:00 to 7:00, and I
7 think it was 9:00 to 1:00 on Saturday.
8 Can you work six days open to close. And
9 then do they really want to come into
10 this industry. You know, especially if I
11 don't have any openings in a particular
12 center, I don't have any openings in this
13 center, however, I have openings in that
14 center. You know, when you're an area
15 supervisor, you don't have that many
16 stores, so you don't have openings all
17 the time.

18 Then they would say, yeah,
19 that would be great, you'd bring them in
20 for an interview. Or they'd say no, not
21 interested, I don't want to work on
22 commission. Or I didn't realize it was
23 that kind of a sale. Or I just thought
24 I'd be weighing people in. I used to

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1 hear that a lot. I just thought you'd be
2 doing -- you know, just weighed people.
3 So you tell them a little bit about what
4 they're going to be doing because I don't
5 want to waste their time and I don't
6 really want to waste my own.

7 Q. Anything else that you do in
8 the prescreening other than what you've
9 already said?

10 A. Tell them about the hours,
11 tell them about the pay, tell them about
12 the emotional connection on the sale.
13 No. That's about it.

14 Q. With respect to telling them
15 the pay, how specific did you get on
16 that?

17 A. Very.

18 Q. I mean, did you tell -- you
19 told them it was \$8 an hour for a
20 counselor or \$7 an hour plus a certain
21 percentage, 3 or 4 percent. Right? Did
22 you get that specific with them?

23 A. I was that specific. I can
24 only speak for me. I was very specific.

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1 Q. Did you discuss with them
2 what they could expect to earn
3 annualized?

4 A. Yes.

5 Q. You did?

6 A. I did.

7 Q. Was that based on -- that
8 was based on what exactly?

9 A. That's what we've always
10 done. I mean, we were very specific
11 about we wanted people who could sell and
12 service. And we wanted that particular
13 individual that was very comfortable
14 working on a commission.

15 Q. What kind of figures did you
16 give them? First of all, did you give
17 them one figure or did you give them a
18 range as far as annualized?

19 A. Every call was different.
20 Some people who were comfortable working
21 on commission went, hey, that's great.
22 And other people who weren't comfortable
23 working on commission, well, what do you
24 think I could make. And depending on the

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1 store, and depending on their sales
2 experience, I can't be sure one way --
3 for sure one way or the other exactly the
4 number I gave them, but I know I probably
5 gave them some figure. Well, it depends
6 on how good you are.

7 Q. So you gave them like a
8 range?

9 A. I don't know if I really
10 want to even say a range. Again, I can't
11 be 100 percent sure if I gave them a
12 range or I gave them what they could
13 expect hourly. You know, taking into
14 account they have no sales experience
15 whatsoever, you might not make more than
16 \$8 an hour if you can't sell.

17 Q. Did you wait for the
18 applicant to bring up the issue of
19 earnings or did you bring it up?

20 A. No. I was very up front.
21 Sales experience, these are the hours
22 that we need you to work, required to
23 work, and this is what the rate of pay
24 is.

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1 Q. With respect to you
2 mentioned tell them the hours, tell them
3 the pay, tell them about the emotional
4 connection related to the sale. What did
5 you tell them in that regard, the third
6 item, emotional connection?

7 A. Being in the business for a
8 very, very long time, I learned over the
9 years that many people didn't realize,
10 heck, I didn't realize when I first
11 started in the industry, what the
12 initial -- what you do. So when I would
13 do my interviewing on the phone, I would
14 tell them, look, let me tell you a little
15 bit about what we do. We counsel men and
16 women who need to lose weight, anywhere
17 from 5 pounds to 105 pounds. Our whole
18 job is to find out the real reason why
19 they want to lose weight. We got to
20 really touch upon -- a lot of times it
21 could be they're not as sexually active
22 with their mate. It could be something
23 emotional as the fact of they can't fit
24 into a seat with their kid. During that

1 don't want to put words in your mouth,
2 but it sounds like that's the objective?
3 A. You're on the right track,
4 but it's not that simple. A female will
5 wake up in the morning and have nothing
6 to put on. Nothing. Literally nothing.
7 And unless you're a woman going through
8 your closet, and you see she's smiling,
9 going through the closet because
10 something doesn't fit and you have a pile
11 of clothes on your bed, all of a sudden
12 you're panicked. She makes an emotional
13 decision at that point, I have to do
14 something about my weight.

15 My job is, when she calls
16 in, is not to let that emotion cool down.
17 If I wait more than 24 hours, it's no
18 longer important to her. So I have to
19 make that emotional connection right
20 there and then on the phone. She can't
21 see my face. So I have to be truly
22 caring, truly want to be there to help
23 her lose weight.

24 So then she comes in. And

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1 time period, we heard a lot of women who
2 were stay-at-home moms who -- it's so
3 sad, their kids wouldn't want them
4 walking to the bus stop. I mean, these
5 are things that a person who wants to be
6 in this industry, really wants to go and
7 help this individual. And that's the
8 crux of what we do.

9 We need to find out why this
10 person is here, because then I have to
11 turn around and ask you for a lump sum of
12 money. So I need to be able to get to
13 the point where you want to be here
14 because you want me, I'm selling me, I've
15 got to have that emotional connection
16 with you in order to get you to want to
17 give me \$800, \$900 of your hard earned
18 money.

19 Q. So the goal then, the
20 emotional connection aspect of the sale
21 that you're talking about, is to figure
22 out why the person's weight is of concern
23 to them, why they've come through the
24 door? I mean, it sounds like that. I

1 then I need to sit there and find out,
2 because now she has her defenses up. Now
3 she's sitting there like this, okay,
4 lady, I've done this a hundred times,
5 what do you think you're going to tell me
6 that I don't already know, that I can't
7 read in a magazine or go join a gym or do
8 something. I have to dive into her to
9 truly find out why she's here. And it's
10 usually because she's not as intimate
11 with her significant other as she would
12 like to be, whether it's real or implied,
13 because sometimes women can make their
14 own stories up in their heads.

15 Usually there's a special
16 event coming up that they want to get
17 ready for or somebody said something that
18 made them not happy, made them cry. So
19 that emotional element that we get makes
20 her take out her checkbook and sign that
21 check for \$800. So without that
22 connection to her, and we call it
23 bringing her down and to bring her back
24 up again. So without getting her to that

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1 emotional point, she's going to say, no,
2 it's too much money and go out the door.
3 And that's the difference between making
4 the connection with the client and not
5 making the connection with the client.
6 Did that make sense?

7 Q. It's an initial assessment,
8 then, of why the person is there, why
9 their weight is of concern for the
10 purpose of then selling them the program?

11 A. It's the only way to sell
12 the program. If you don't make the
13 emotional program, you come out with a no
14 sale.

15 Q. You say bringing them down
16 and then bringing them back up. What
17 does that mean exactly, bringing them
18 down?

19 A. Bringing them down in that
20 deep dark spot that they wouldn't even
21 tell their husband, their wife, their
22 girlfriend, their mother or best friend.
23 You bring them to a point that they have
24 to admit to somebody that, you know what,

1 not to look better or feel better. It's
2 usually to keep their spouse, to make
3 their kids proud of them or maybe they
4 want to look good for a special event.
5 Whatever it is. And then you need to
6 bring them back up to the point that they
7 realize there is hope. They don't have
8 to be trapped in this body anymore.

9 Q. So the weight loss is seen
10 as a means to some other end, whatever
11 that is, different for each person?

12 A. It's different for each
13 person. Some people it is lifesaving. I
14 mean, I can't tell you how many clients
15 have come off of medication because their
16 doctor said, look, you got two choices,
17 lose weight or else.

18 Q. Diabetes, for example?

19 A. Diabetes, heart disease,
20 stroke, death in some cases. So there's
21 all different reasons why people want to
22 lose the weight. The emotion is the big
23 one. And I'm -- you know, if a doctor
24 told me, look, you better lose weight or

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1 I don't like the way I look anymore, I
2 don't like the way I feel. I can't do
3 the things I want to do and be the things
4 I want to be because my weight is
5 stopping me from dressing the way I want
6 to dress, looking the way I want to look,
7 being intimate the way I want to be
8 intimate. I mean, we women are very --
9 especially if you have a female sitting
10 in front of you, and men are just the
11 same, okay, it's amazing.

12 You then get them to that
13 point where they're finally admitting to
14 you their deepest darkest secret that
15 they wouldn't tell anyone. You bring
16 them up again by promising them and
17 giving them hope that, you know what,
18 we're going to change your life together.
19 We're going to help you lose this weight.
20 And this is how we're going to do it. So
21 you have to get them down to that point
22 where they're admitting to you the reason
23 why they want to change their life. Like
24 why don't they want to lose weight, it's

1 you could be a Type II diabetic and lose
2 a leg. That's emotional as well, because
3 I like my feet.

4 So weight -- there's always
5 something attached emotional to the
6 weight issue and losing weight, it's not
7 just the diet. It's who works there.
8 Anybody can go and pay money to lose
9 weight, but does it mean you're really
10 going to lose weight if you don't have
11 that support and that encouragement and
12 that motivation, no.

13 Q. Do your employees receive
14 training on this?

15 A. Yes.

16 Q. On making that emotional
17 connection?

18 A. No, not the emotional
19 connection. They receive training on how
20 to dispense the program. But the
21 emotional connection, you either have it
22 or you don't. I can't train you to be a
23 nice human being. To be sincere. To be
24 empathetic. You have to be that.

28 (Pages 106 to 109)

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1 Q. There's a training program
2 or a class that I've seen referenced
3 called emotional triggers.

4 A. Okay.

5 Q. Are you familiar with that?

6 A. Emotional rescue.

7 Q. Emotional rescue. What is
8 that?

9 A. It's advanced. It's
10 different techniques and different
11 trainings. Taking somebody who has the
12 talent, okay, you are very empathetic and
13 you come to me and you have all those
14 qualities, you're empathetic, you're
15 sincere, you truly want to help another
16 human being. And what I need to do is to
17 step by step show you different questions
18 to ask in order to find the right answers
19 that you need in order to make that
20 client buy the program. I can't train
21 you, though, to be nice. You have to
22 either have it or you don't. I can't
23 train you to be empathetic.

24 Q. But you monitor that? As a

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1 supervisor, you watch people's dailies,
2 for example?

3 A. Yes. I do watch their daily
4 visits with the clients.

5 Q. And if there's an empathy
6 issue there, a lack of emotional
7 connection, you're there to assess
8 things?

9 A. Well, if I made the right
10 hiring decision, then I hired someone who
11 was already empathetic, if I did my job
12 the right way.

13 Q. But you don't always do
14 your -- you don't always hire perfect
15 employees, though. Right?

16 A. Sometimes no, I don't always
17 hire the right -- I mean, yes, I do make
18 a hiring mistake.

19 Q. So you are there then to --
20 in part to see that they are making that
21 connection?

22 A. Yes.

23 Q. What if they're not? Have
24 you had that situation come up?

1 A. It's not that the person
2 that -- it's not that the person who is
3 doing the daily visit lacked empathy. A
4 lot of times we would have to teach how
5 to leave their personal issues outside
6 the door. Maybe they had a fight with
7 their dog or their kid or their mom or
8 their dad or their husband or their wife.
9 And they -- sometimes we would have to
10 teach, okay, when you come in, everything
11 has to stay at the door. So it not as
12 black and white as that.

13 Your question, sometimes it
14 has nothing to do with that person lacked
15 empathy. Sometimes they just lacked work
16 experience as far as keeping your
17 emotions outside the door. If I did have
18 an individual that lacked empathy, then I
19 have to sit back and say look, Lesia, you
20 really messed up on this one. I don't
21 think I've ever hired somebody who lacked
22 significantly in empathy. That I can
23 recall anyway. I've hired a lot of
24 people.

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1 Q. The center level employees,
2 I know they receive training, a service
3 training on center operations. Correct?

4 A. All employees receive
5 training on center operations.

6 Q. Do the center level
7 employees receive any additional sales
8 training that goes beyond the service
9 training?

10 A. What years are we talking
11 about?

12 Q. Let's start with early '97
13 to mid-'98.

14 A. All employees at that point
15 went through sales and service training.

16 Q. What is taught in the sales
17 training? Sales is a very broad
18 category. I mean, what specifically is
19 taught in the sales training during that
20 period?

21 A. The mechanics of our sales
22 consultation. The mechanics of how to
23 sell our program.

24 Q. Has that ever changed?

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1 A. The sales training?

2 Q. Yes.

3 A. It's always changing. It
4 always changes.

5 Q. How has it changed over
6 time?

7 A. It changes with the clients,
8 because clients ten years ago aren't the
9 same buying client as they are today.

10 Q. How so?

11 A. Well, ten years ago, most
12 women and men trying to lose weight, ten
13 years ago would pay \$2,000, \$3,000 right
14 up front to lose weight. At that point
15 you had to be very, very, very, very,
16 very good at what you do. Now, you have
17 to be even better, because nowadays,
18 you're dealing with a smarter consumer.
19 You're dealing with someone who has done
20 multiple programs, they can go and
21 download the web, they don't work, we
22 know that, but you have to be very good
23 at finding that emotional connection now.

24 So our consultation changes,

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1 and maybe I should back up, the content
2 doesn't change as far as getting the
3 emotional trigger, but the way we present
4 it changes. Maybe I should -- there are
5 two different things.

6 Q. Are there techniques taught
7 for identifying the emotional trigger?

8 A. Are there techniques? Yes,
9 there are techniques that are taught.

10 Wait a minute. Back up. Define
11 techniques, when you say techniques.

12 Q. A method. Here is a way
13 that you can identify an emotional
14 trigger. Here are some questions to ask
15 that will help you get at that?

16 A. Yes.

17 Q. That is taught. Is that
18 taught as part of the service training?

19 A. At that time period, service
20 training was who can do the program, who
21 can't do the program, the different
22 plans. Part of service training at that
23 point was what we call now the power
24 week, which is the program explanation,

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1 which isn't the enrollment, okay, of the
2 client. So during that period of time,
3 yes. How to do a medical history. These
4 are questions that you ask.

5 For instance, you wouldn't
6 say, what are your favorite foods. You
7 would say tell me about your favorite
8 foods. Do your favorite foods -- tell me
9 when you crave your favorite foods, is it
10 during your menstrual cycle, is it when
11 you're under stress. You know, so we
12 would teach the person how to ask the
13 question different ways that were
14 comfortable to the person to get the
15 answer we needed.

16 Q. Has that ever been
17 different? Has that ever changed over
18 time as far as -- not the questions
19 asked, but the fact that there is
20 teaching done on what questions to ask to
21 get at the emotional trigger? Has that
22 always been a part of the training
23 program, as far as you know?

24 A. We've always taught the

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1 emotional element as far as what
2 responses constitute an emotional
3 element. You know, losing weight just
4 because I want to lose weight is not an
5 emotional element. Losing weight because
6 you want to go to your kid's party and
7 don't want to be laughed at is an
8 emotional element.

9 So we would teach the scope
10 of the answers that we were looking for
11 or the realm or the scope of the answers
12 that we were looking so that the person
13 we were teaching knew that's what we're
14 looking for and that's not what we're
15 looking for. Does that make sense?

16 Q. Now, going back to the
17 hiring process and going back from the
18 start of '97 into '98 when you became a
19 regional, this period when you were an
20 area manager after the company became LA.
21 You've done the prescreen. You bring the
22 person in for an interview. Is that the
23 next step, if they're a suitable
24 candidate?

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1 A. And they decide they want to
2 come in for an interview.

3 Q. What are you doing in this
4 interview? What's your purpose?

5 A. Dive into a little bit more
6 on what they've done in the past, you
7 know, their jobs, and you try and find
8 out how their past job experiences can
9 best relate to what we're doing. You
10 know, again, you've got to be -- relevant
11 work experience. There has to be some
12 relevancy to -- there has to be something
13 that they want. I'm sorry, I'm getting
14 hungry. There has to be a skill that
15 they can take from that job to pull over
16 into this job. And then a lot of the
17 interview back then was, we really
18 described what we did. You know, once we
19 determined that the person can sell, had
20 demonstrated, you know, good
21 communications. Because in the
22 interview, you're making that connection,
23 I'm thinking can they communicate with
24 me. Do they have good eye contact, do

1 talking with a client every single day,
2 eight hours a day, about why they eat.
3 And a lot of times you have an applicant,
4 you go, you're kidding me, right, like,
5 they had no clue that that's what we did.
6 And for some people, they disqualify
7 themselves. They go, I don't want any
8 part of that. And some people go, no,
9 that sounds real interesting.

10 So we would talk a lot about
11 that. Tell me what you've done in the
12 past that relates to that. Then from
13 that point in time, at that point, then
14 we would talk a lot about, okay, this is
15 a commission-based job. Your ability to
16 communicate with that client, your
17 ability to sell to that client, to care
18 about that client is going to determine
19 your paycheck. Let's talk about how
20 comfortable -- tell me what you've done
21 in the past that you've worked on
22 commission. Have you ever had to make
23 your own check. Because that's basically
24 what you're doing.

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1 they have good body language. You know,
2 do they speak to me. Can they speak to
3 me. A lot of it you had to actually get
4 with them and actually see were those
5 skills relevant.

6 Q. Anything else, other than
7 determining the relationship between
8 their skill set, their experience and
9 what LA does?

10 A. Do they have passion for
11 weight loss. You know, we talked about,
12 you know, do they have passion to help
13 another human being lose weight. You
14 know, this is a passionate business. We
15 talked a lot, you know, what was
16 relevant, you hear a lot about client's
17 problems. You hear a lot about why they
18 eat. They eat, you know, because their
19 husband is having an affair. Do they eat
20 because their kids are failing out of
21 school. They eat because they're not
22 hungry. They eat because they had a bad
23 day. They eat because they have a
24 headache. You know, you're dealing with

1 I don't remember if we were
2 \$7 or \$8 an hour back then. But we were
3 always commission. So let's talk about
4 what you've done in the past to make your
5 own check. So the interview was many
6 different components from seeing the
7 person, talking to the person, describing
8 to the person what it is we did.

9 Q. Has the nature of the
10 interview changed over time?

11 A. When you say "nature of the
12 interview," what do you mean?

13 Q. Your goals and what is
14 discussed in the interview, have those
15 things changed at all over time?

16 A. Well, in the very beginning,
17 when I first started, it was early on and
18 continued into a portion of Eileen's
19 tenure, it was a shark. You wanted a
20 shark. You wanted the people with the
21 teeth who could sell, who could go in
22 there, close that deal and come on out.
23 And then it would go back and forth there
24 for a while from, okay, now we want -- we

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1 that are different from what you've
2 already described? I'm asking if you
3 know.

4 A. All I know is the minimum,
5 like they have to have multiunit to be an
6 area supervisor, to come in from the
7 outside, and they have to have the
8 ability to sell. They also have to have
9 all the skill sets that I mentioned
10 earlier, and all that has to be present.

11 Q. Now, the skill set you're
12 talking about, the ability to have
13 empathy, the emotional connection, the
14 ability to make an emotional connection
15 with a client, these things?

16 A. Sincerity, warmth.

17 Q. People skills?

18 A. Good people skills. A
19 willingness to want to be there.

20 Q. How do you determine that?
21 With respect to a particular candidate,
22 how do you assess that?

23 A. Like I said earlier, the
24 interview really shows you those skills.

1 they didn't like. Their communication
2 skills. Somebody who can't look me in
3 the eye and is always looking around,
4 they're going to do that with my client.
5 A lot of nonverbal body language is
6 displayed at that point. And then we're
7 telling them about what we do. A lot of
8 times, they'll say, well, it's not really
9 what I thought it was going to be. So
10 the interview tells us a lot.

11 Q. Is there any way to assess
12 the skill set you're talking about by
13 looking at the resume or the application?

14 A. No.

15 Q. There really has to be a
16 personal one-on-one conversation?

17 A. Has to be. It has to be.

18 Q. I take it you've never hired
19 a recruiter, that's not part of your job?

20 A. No.

21 Q. So I'm correct?

22 A. Yeah, no.

23 Q. Other than what we've
24 discussed, and we'll start with the

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1 The ability to make eye contact with the
2 person you're talking with. Their past
3 jobs from the standpoint of, you know,
4 you could have somebody who worked in
5 retail who is quite qualified but hates
6 working with people, is not going to do
7 well in my business.

8 Q. You have to interview and
9 that's how you find that out, through
10 interview?

11 A. Exactly. So the interview
12 tells you a lot about if you ask an
13 applicant why do you want to leave your
14 current position, well, I hate working
15 with people. Well, then this is not
16 going to definitely be the job for that
17 particular person. So the interview
18 definitely sheds a lot of light,
19 specifically because the interview is a
20 dialogue.

21 We have questions that we
22 ask in order to have them tell us the
23 highlights of their past jobs and their
24 performances and what they liked and what

1 center level jobs, as far as things that
2 you consider to be necessary for a
3 candidate for those jobs, all of the
4 things we've talked about, can you think
5 of any other things that you look for in
6 a successful candidate? Any types of
7 experience, any types of educational
8 background? Anything at all that you try
9 to key in on as desirable?

10 A. Everything I've already
11 said.

12 Q. For example, for a center
13 manager, do you look for sales? Is that
14 something that you're looking for for
15 that position?

16 A. Well, like I said to you
17 earlier, we always look for sales. In
18 the early days, we just looked for
19 sharks. Now we're looking for that more
20 well rounded sales and service person,
21 the person who cannot only sell my
22 program, but then service the sale.

23 So sales is always there,
24 but at different points in time. And,